

PSJ15 Exh 75



Mallinckrodt, Inc.
Pharmaceutical Products
3600 North Second Street
St. Louis, MO 63147

St. Louis Site Controlled Substance Compliance

May 9, 2011

Drug Enforcement Administration
Attn: Pete Kleissle, Diversion Group Supervisor
317 South 16th Street
St. Louis, MO 63103

Subject: Sales of Bulk Morphine Sulfate to Smart Pharmacy

Mr. Kleissle,

Mallinckrodt, registration PM0037451, has been contacted by Smart Pharmacy Inc. 1650 San Pablo Road South Suite 17 Jacksonville, FL 32224, registration FS0195417, as part of a sales request for bulk morphine sulfate. Smart Pharmacy is licensed as a retail pharmacy and has requested five kilograms of morphine sulfate to be used in the production of topical pain creams and as an elixir for a patient with severe colitis. The pharmacy states that it began the process of becoming an accredited compounding pharmacy, and it does not conduct business on the internet or outside the United States.

Mallinckrodt remains concerned that a morphine sulfate order as large as five kilograms would constitute activity that is more congruent with a manufacturing registration than a retail pharmacy registration. Smart Pharmacy would represent a new business account for Mallinckrodt, and this quantity lies outside of Mallinckrodt's comfort zone. Unless advised to the contrary, Mallinckrodt would view this order as suspicious. Mallinckrodt requests your guidance as to whether a retail pharmacy could use this quantity of morphine sulfate and still remain compliant as a retail pharmacy. A copy of Smart Pharmacy's retail registration is enclosed with this letter.

Sincerely,

A handwritten signature in black ink that appears to read "David R. Hunter".

David R. Hunter
Supervisor, Controlled Substance Compliance
(314) 654-1310
dave.hunter@covidien.com

Contains Confidential and Proprietary Information

SMART PHARMACY, INC
1650 SAN PABLO ROAD SOUTH
SUITE 17
JACKSONVILLE, FL 32224-0000-000

DEA REGISTRATION NUMBER	THE REGISTRATION EXPIRES	FEES PAID
FS0195417	02-28-2013	FEES PAID
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N, 3,3N,4,5	RETAIL PHARMACY	01-22-2010
SMART PHARMACY, INC 1650 SAN PABLO ROAD SOUTH SUITE 17 JACKSONVILLE, FL 32224-0000		

CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE
UNITED STATES DEPARTMENT OF JUSTICE
DRUG ENFORCEMENT ADMINISTRATION
WASHINGTON D.C. 20537

Sections 204 and 1008 (21 USC 824 and 858) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.

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CONTROLLED SUBSTANCE/REGULATED CHEMICAL
REGISTRATION CERTIFICATE
UNITED STATES DEPARTMENT OF JUSTICE
DRUG ENFORCEMENT ADMINISTRATION
WASHINGTON D.C. 20537

Sections 304 and 1008 (21 USC 824 and 958) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.

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**REPORT
CHANGES
PROMPTLY**

Form DEA-223/S11 (4/07)

**REQUESTING MODIFICATIONS TO YOUR
REGISTRATION CERTIFICATE**

To request a change to your registered name, address, the drug schedule or the drug codes you handle, please:

1. visit our web site at deadiversion.usdoj.gov - or
2. call our customer Service Center at 1-(800) 882-9539 - or
3. submit your change(s) in writing to:
Drug Enforcement Administration
P.O. Box 28083
Washington, DC 20083

See Title 21 Code of Federal Regulations, Section 1301.51 for complete instructions

You have been registered to handle the following chemical/drug codes:

136-664-6289